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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RONALD J.; NORA J. and NOAH J.;
MINORS BY AND THROUGH THEIR
GUARDIAN AD LITEM, CURTIS R. NAMBA,

Case No.: 4:11-cv-04123 CW

Plaintiffs,

**STIPULATION FOR ORDER FOR
LEAVE TO FILE SECOND AMENDED
COMPLAINT**

v.

COUNTY OF ALAMEDA; ALAMEDA
COUNTY SOCIAL SERVICES; DOE
ALAMEDA COUNTY SOCIAL SERVICES'
SOCIAL WORKER; ALAMEDA COUNTY
SOCIAL SERVICES' SUPERVISOR; WEST
COAST CHILDREN'S CLINIC; DOES 1
through 60 inclusive,

Judge: Hon. Claudia Wilken

Defendants.

IT IS HEREBY STIPULATED between the parties, by and through their counsel of record:

1. That this matter is currently set for hearing on September 27, 2011 as
pertaining to the Defendants' Motions to Dismiss and Plaintiffs' Opposition Papers to same.

2. That Defendants, COUNTY OF ALAMEDA and WEST COAST, et al. agree to
withdraw their respective Motions to Dismiss and request that the hearing date of September

27, 2011 be vacated.

3. That Plaintiffs and Defendants, COUNTY OF ALAMEDA and WEST COAST, et al. agree to an Order granting Plaintiff's leave to file a Second Amended Complaint by Plaintiffs.

4. Plaintiffs will file their Second Amended Complaint within fourteen days of the filing of this stipulation.

5. Defendants, COUNTY OF ALAMEDA and WEST COAST, et al., will each respectively have the opportunity to challenge the sufficiency of the new pleading with a Rule 12 Motion.

IT IS SO STIPULATED.

DATED:

DREYER BABICH BUCCOLA WOOD, LLP

By: _____

ROBERT A. BUCCOLA
Attorney for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

DATED: *9/19/2011*

CAULFIELD, DAVIES & DONAHUE, LLP

By: _____

James R. Donahue
JAMES R. DONAHUE
Attorney for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

DATED:

PERRY JOHNSON ANDERSON, et al.

By: _____

ANNE C. D'ARCY
Attorney for Defendant, West Coast Children's C
Clinic

DATED:

HAAPALA THOMPSON & ABERN, LLP

By: _____

REBECCA W. WIDEN
Attorney for Defendant, County of Alameda

27, 2011 be vacated.

3. That Plaintiffs and Defendants, COUNTY OF ALAMEDA and WEST COAST, et al. agree to an Order granting Plaintiff's leave to file a Second Amended Complaint by Plaintiffs.

4. Plaintiffs will file their Second Amended Complaint within fourteen days of the filing of this stipulation.

5. Defendants, COUNTY OF ALAMEDA and WEST COAST, et al., will each respectively have the opportunity to challenge the sufficiency of the new pleading with a Rule 12 Motion.

IT IS SO STIPULATED.

DATED: **DREYER BABICH BUCCOLA WOOD, LLP**

By: _____
ROBERT A. BUCCOLA
Attorneys for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

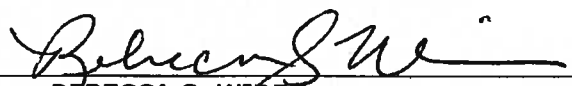
DATED: **CAULFIELD, DAVIES & DONAHUE, LLP**

By: _____
JAMES R. DONAHUE
Attorneys for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

DATED: **PERRY JOHNSON ANDERSON, et al.**

By: _____
ANNE C. D'ARCY
Attorneys for Defendant, West Coast Children's
Clinic

DATED: **9/19/11** **HAAPALA THOMPSON & ABERN, LLP**

By:  _____
REBECCA S. WIDEN
Attorneys for Defendant, County of Alameda

27, 2011 be vacated.

3. That Plaintiffs and Defendants, COUNTY OF ALAMEDA and WEST COAST, et al. agree to an Order granting Plaintiff's leave to file a Second Amended Complaint by Plaintiffs.

4. Plaintiffs will file their Second Amended Complaint within fourteen days of the filing of this stipulation.

5. Defendants, COUNTY OF ALAMEDA and WEST COAST, et al., will each respectively have the opportunity to challenge the sufficiency of the new pleading with a Rule 12 Motion.

IT IS SO STIPULATED.

DATED:

DREYER BABICH BUCCOLA WOOD, LLP

By: _____

ROBERT A. BUCCOLA
Attorney for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

DATED:

CAULFIELD, DAVIES & DONAHUE, LLP

By: _____

JAMES R. DONAHUE
Attorney for Plaintiffs, R.J.; N.J. and N.J., minors,
By and through their Guardian Ad Litem, Curtis R.
Namba

DATED: *19 Sept. 2011*

PERRY JOHNSON ANDERSON, et al.

By: _____

Anne C. D'Arcy
ANNE C. D'ARCY
Attorney for Defendant, West Coast Children's C
Clinic

DATED:

HAAPALA THOMPSON & ABERN, LLP

By: _____

REBECCA W. WIDEN
Attorney for Defendant, County of Alameda

ORDER

Pursuant to stipulation and for good cause shown, it is SO ORDERED. The Motions of Defendants, COUNTY OF ALAMEDA, ALAMEDA COUNTY SOCIAL SERVICES, DOE ALAMEDA COUNTY SOCIAL SERVICES' SOCIAL WORKER, ALAMEDA COUNTY SOCIAL SERVICES' SUPERVISOR and WEST COAST CHILDREN'S CLINIC, are hereby dropped. Plaintiffs are granted leave to amend to file their Second Amended Complaint no later than October 3, 2011. Defendants shall file their responses to the Second Amended Complaint no later than October 17, 2011.

Dated: 9/20/2011


Honorable Claudia Wilken
United States District Judge